IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: February 11, 2009

JOHN AGOT CANLAS : VIOLATIONS:

RASHEID MALIC ROBINSON 18 U.S.C. § 371 (conspiracy to commit

MARQUIS JAMAL WICKER : armed bank robbery - 1 count)

18 U.S.C. § 2113(d) (armed bank robbery -

: 1 count)

18 U.S.C. § 924(c) (using and carrying a

firearm during and in relation to a crime of

violence - 1 count)

: 18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 22, 2008, in Spring House, Pennsylvania, in the
 Eastern District of Pennsylvania, defendants

JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER

conspired and agreed together to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the Abington Bank, in Spring House, Pennsylvania (hereafter "the bank"), the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER agreed to commit an armed robbery of the Abington Bank, located at 800 N. Bethlehem Pike, Spring House, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about October 22, 2008:

- Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER discussed their plan to rob the Abington Bank, located at 800
 N. Bethlehem Pike in Spring House, Pennsylvania.
- Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER drove together to the Abington Bank to commit an armed bank robbery.
- 3. Defendants RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER entered the Abington Bank wearing masks, while defendant JOHN AGOT CANLAS waited outside in a get-away vehicle.
- 4. Once inside the bank, defendant MARQUIS JAMAL WICKER brandished a .22 caliber rifle and ordered employees to lay on the floor.
- Defendants RASHEID MALIC ROBINSON, and MARQUIS JAMAL
 WICKER demanded money from the bank's tellers at gunpoint, stole approximately \$14,018,

and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2008, in Spring House, in the Eastern District of Pennsylvania, defendants

JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Abington Bank, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Abington Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants CANLAS, ROBINSON, and WICKER knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Abington Bank, and other persons, by use of a dangerous weapon, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2006, in Spring House, in the Eastern District of Pennsylvania, defendants

JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

NOTICE OF FORFEITURE

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER

shall forfeit to the United States of America, the firearm involved in the commission of this offense, including, but not limited to:

-a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

	A TRUE BILL:
	GRAND JURY FOREPERSON
LAURIE MAGID Acting United States Attorney	